

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SYDNEY WATSON,

Plaintiff,

v.

BLAZE MEDIA LLC,

Defendant.

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Case No. 3:23-CV-00279-B

**PLAINTIFF SYDNEY WATSON’S RESPONSE TO DEFENDANT BLAZE MEDIA
LLC’S MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO STAY
PROCEEDINGS AND COMPEL ARBITRATION**

Sydney Watson (“Watson” or “Plaintiff”) hereby files her Response to The Blaze Media’s (“Blaze” or “Defendant”) Motion to Dismiss or, in the alternative, to Stay Proceedings and Compel Arbitration, and respectfully shows as follows:

1. The Blaze is not entitled to compel plaintiff Sydney Watson to arbitrate her discrimination and retaliation claims because 1) The Ending Forced Arbitration of Sexual Assault and Sexual Harassment Act (Title 9 U.S.C. Section 401, et seq.) (the “Act”) bars forced arbitration of Ms. Watson’s claims, and 2) the subject Arbitration Agreement does not compel arbitration of sexual harassment lawsuits. Should the Court compel arbitration, it should stay this case so that judgment may be entered upon completion of arbitration;
2. Plaintiff Sydney Watson has stated claims upon which relief can be granted as to all claims pleaded in the Complaint;
3. In support of this response Plaintiff Sydney Watson files a supporting brief.

Dated: April 10, 2023

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF
SYDNEY WATSON

CERTIFICATE OF SERVICE

I certify that on this 10th day of April, 2023, the undersigned provided a copy of *PLAINTIFF SYDNEY WATSON'S RESPONSE TO DEFENDANT BLAZE MEDIA LLC'S MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO STAY PROCEEDINGS AND COMPEL ARBITRATION* to counsel in this case via the U.S. Northern District of Texas ECF filing system as follows:

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